

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

KENNETH E. SAVAGE, JR.,

PLAINTIFF,

VS.

NO. 2:14-cv-02057-STA-dkv

FEDERAL EXPRESS CORPORATION,
D/B/A FEDEX EXPRESS, FEDEX
CORPORATION EMPLOYEES' PENSION
PLAN, FEDEX CORPORATION RETIREMENT
SAVINGS PLAN,

DEFENDANTS.

DEPOSITION

OF

SEAN DRIVER

JUNE 2, 2015

TAMMY WENDEL, LCR, CCR
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1 The deposition of SEAN DRIVER is
2 taken on this, the 2nd day of June, 2015, on
3 behalf of the Plaintiff, pursuant to notice and
4 consent of counsel, beginning at approximately
5 9:10 a.m. at FedEx World Headquarters, 3620
6 Hacks Cross Road, Building B, Memphis,
7 Tennessee.

8 This deposition is taken pursuant to
9 the terms and provisions of the Tennessee Rules
10 of Civil Procedure.

11 All forms and formalities, including
12 the signature of the witness, are waived, and
13 objections alone as to matters of competency,
14 irrelevancy and immateriality of the testimony
15 are reserved to be presented and disposed of at
16 or before the hearing.

A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:

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1 Q. "Terminated/resigned, disposition."
2 What does that mean?

3 A. The employee was terminated and/or
4 resigned due to the investigation.

5 Q. So based on the table you've given
6 me, at every place that it says
7 "terminated/resigned," there's no way for me to
8 tell whether or not the employee -- he either
9 resigned or was terminated, correct?

10 A. Correct.

11 Q. Okay. Thank you. And is that
12 because the -- well, you tell me. It says
13 "terminated/resigned." Are employees offered
14 the opportunity to resign?

15 A. The employees do have the right to
16 resign.

17 Q. Even while under investigation?

18 A. An employee can resign at any time.

19 Q. All right. Now, let's go back to
20 where it says "Date Pulled." Do you see that?

21 A. Yes.

22 Q. August 31st, 2012, and it says it was
23 in the second quarter. Is August in the second
24 quarter?

C E R T I F I C A T E

STATE OF TENNESSEE:

COUNTY OF MADISON:

I, TAMMY W. WENDEL, LCR, and Notary Public, Madison County, Tennessee, CERTIFY:

The foregoing proceedings were taken before me at the time and place stated in the foregoing styled cause with the appearances as noted.

Being a Court Reporter, I then reported the proceeding in Stenotype, and the foregoing pages contain a true and correct transcript of my said Stenotype notes then and there taken.

I am not in the employ of and am not related to any of the parties or their counsel, and I have no interest in the matter involved.

I further certify that in order for this document to be considered a true and correct copy, it must bear my original signature and that any reproduction in whole or in part of this document is not authorized and not to be considered authentic. Unauthorized reproduction and/or transfer will be in violation of Tennessee Code Annotated 39-14-149, Theft of Services.

Witness my signature this the _____ day of _____, 2015.

TAMMY W. WENDEL, LCR

Notary Public at Large
For the State of Tennessee
My Commission Expires:
February 24, 2016